



**VOSH PROGRAM DIRECTIVE: 12-421**

**ISSUED: August 1, 1999**

**SUBJECT: Dipping and Coating Operations, General Industry, Revised Final Rule, §§1910.122 through 1910.126**

**A. Purpose.**

This directive transmits to field personnel the final standard on Dipping and Coating Operations which is designed to protect employees from fire, explosion and other hazards associated with dipping and coating operations. The revisions ensure that OSHA's requirements conform to the updated National Fire Protection Association Standard (34-1995) governing dipping and coating operations and include many provisions written in performance-oriented language that provides employers flexibility in complying with the standard.

*This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.*

**B. Scope.**

This directive applies to all VOSH personnel and specifically to occupational health compliance personnel.

**C. References.**

64 FR 13897 (March 23, 1999); and OSHA Memorandum 99-1 (December 2, 1998)

**D. Cancellation.**

Not Applicable.

**E. Action.**

The Deputy Commissioner, Directors and Managers shall ensure that field personnel understand and comply with the provisions of this Directive.

**F. Effective Date.**

August 15, 1999

**G. Expiration Date.**

Not Applicable.

**H. Background.**

President Clinton directed all federal regulatory agencies to review their regulations to determine if the regulations should be revised or revoked. OSHA initiated such a review and, as a result, rewrote these standards in plain language since dip tanks pose serious hazards to employees engaged in dipping and coating operations. These standards also reflect changes in dipping and coating operations that have occurred since the existing OSHA regulations were promulgated in the 1970's.

Wherever metals are coated, furniture is stripped and refinished, automobiles are repaired, aircraft are maintained, and leather is tanned, dip tanks are an essential part of the process. The liquids used to perform these operations are often dangerous, from both safety and health standpoints. The liquids include flammable substances such as acetone, corrosive materials such as cyanide acids and chromic acids, and chronic toxins such as perchloroethylene and methylene chloride.

Industries with large numbers of dip tanks include automobile manufacturing, electronic manufacturing, electroplating, defense, transportation equipment, computer manufacturing, automobile repair, paint stripping, and other service industries.

On May 17, 1999, the Safety and Health Codes Board adopted this revised final standard, with an effective date of August 15, 1999.

**I. Summary.**

The revisions in this standard cover paint dipping, electroplating, degreasing, stripping, and other similar operations, and they include updated requirements for ventilation and the personal protective equipment used by employees around dipping tanks. The standard does not cover operations that only use a molten material, such as molten metal or salt.

The revised "plain language" regulations include a new question and answer format designed to help employers better understand and comply with rules governing dipping and coating operations.

The revised requirements include several other changes to the existing standard, including new performance-oriented language that requires employers to ensure that vapor concentrations do not exceed 25 percent of the lower flammable limit (LFL) of any flammable material. Employers who install or upgrade ventilation systems would be required to comply with more recently updated consensus standards governing those operations.

The revised standard also requires employers to provide: locker space or other storage space to prevent contamination of employee's street clothes; emergency shower and eye-wash stations close to the dipping or coating operations; and physician's approval before any employee with a sore, burn, or other skin lesion requiring medical attention is returned to work in the area surrounding the dip tank.

In addition to the revised final rule for Dipping and Coating Operations, several related standards were also amended. In *§1910.6, Incorporation by reference*, outdated references were replaced with current references; in *§1910.94, Ventilation*, paragraph (d), *Open surface tanks*, was removed. It applied to all operations involving the immersion of materials in liquids, or in the vapors of such liquids to clean or alter the surface and its removal. *Section 1910.108, Dip tanks containing flammable or combustible liquids*, was removed and reserved, and *§1910.121* was added and reserved.

The final standard did not change the technical substance of the former standards.

*John Mills Barr*  
Commissioner

E-Attachment: 64 FR 13897 (March 23, 1999)

[http://www.osha.gov/pls/oshaweb/owasrch.search\\_form?p\\_doc\\_type=FEDERAL\\_REGISTRATION&p\\_toc\\_level=2&p\\_keyvalue=64&p\\_text\\_version=FALSE](http://www.osha.gov/pls/oshaweb/owasrch.search_form?p_doc_type=FEDERAL_REGISTRATION&p_toc_level=2&p_keyvalue=64&p_text_version=FALSE)

Distribution: Commissioner of Labor and Industry  
Deputy Commissioner  
Directors and Managers  
VOSH Compliance Staff  
Cooperative Programs Staff  
Legal Support Staff  
OSHA Regional Administrator, Region III

**16 VAC 25-90-1910.122, DIPPING AND COATING OPERATIONS, GENERAL INDUSTRY,  
§§1910.122 THROUGH 1910.126**

As Adopted by the  
Safety and Health Codes Board

Date: May 17, 1999



VIRGINIA OCCUPATIONAL SAFETY AND HEALTH PROGRAM

VIRGINIA DEPARTMENT OF LABOR AND INDUSTRY

Effective Date: August 15, 1999

New 16 VAC 25-90-1910.122 through 1910.126, Dipping and Coating Operations,  
General Industry, §§1910.122 through 1910.126

Amendment of 16 VAC 25-90-1910.6, Incorporation by Reference,  
General Industry, §1910.6

Repeal of 16 VAC 25-90-1910.94, Ventilation, General Industry, §1910.94

Repeal of 16 VAC 25-90-1910.108, Dip Tanks Containing Flammable or Combustible Liquids, General  
Industry, §1910.108

When the regulations, as set forth in the revised final rule for 16 VAC 25-90-1910.122 through 1910.126,

Dipping and Coating Operations, General Industry, §§1910.122 through 1910.126, and other related standards, are applied to the Commissioner of the Department of Labor and Industry and/or to Virginia employers, the following federal terms shall be considered to read as below:

Federal Terms

VOSH Equivalent

29 CFR

VOSH Standard

Assistant Secretary

Commissioner of Labor and Industry

Agency

Department

April 22, 1999

August 15, 1999